

Comment

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Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Cllr Tony de Vere
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Q1 Do you consider the Local Plan is Legally Compliant? Yes

Q2 Do you consider the Local Plan is Sound (positively prepared, effective and Justified) No

If your comment(s) relate to a specific site within a core policy please select this from the drop down list. N/A

If you think your comment relates to the DtC, this is about how we have worked with the Duty to Cooperate bodies (such as neighbouring planning authorities)

Q3 Do you consider the Local Plan complies with the Duty to Co-operate? Yes

Q4 Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Employment Projection in the Vale.

The two main areas for examination are the employment projections from the Enterprise Zone and Satellite Technology. Both these forecasts are dealt in the CE report on page 18 -21 with the following statements:

*The UK Science Vale **Enterprise Zone**, which includes 64ha at Harwell and 28ha at Milton Park, is expected to accommodate 8,400 jobs, of which 5,040 are net additional (source: bid submitted by Oxfordshire Local Enterprise Partnership to the Department for Communities and Local Government, pp 52- 53). If these are distributed proportionately to land, then 5,800 jobs would be at Harwell (net 3,500). At the same density, the whole Harwell site would accommodate nearly 9,000 jobs (5,400 net), in addition to the 4,500 already based there. Table 4.1 summarises the current and prospective employment situation on the Enterprise Zone and the rest of the Harwell site. We also assume that by 2031 Culham will accommodate 1,000 additional jobs, part of which is likely to be above trend.*

And:

In total therefore, we estimate the increase in jobs above trend could be as follows:

5,400 (net) at Harwell and Milton Park , primarily in the EZ but also on other land at Harwell, including some relatively small scale above trend growth in the research facilities linked in particular to greater University of Oxford involvement there. These jobs should be classified to a mix of Other Professional Services, IT services, electronics and pharmaceuticals

500 at Culham , in a mix of Other Professional Services, IT services, electronics, and pharmaceuticals.

Both these statements are about the capacity of these sites to accommodate net additional jobs and new businesses. There is no further analysis to substantiate these forecasts.

In the Space Science/ Satellite technology forecasts are **2,500** above trend growth based on reference to Government BIS statement and select committee reviews and the following general statement:

The Government estimates that space science will grow from a 9bn industry now to one worth 40bn by 2031, generating 100,000 new jobs³. Harwell has a unique concentration of nationally significant research and commercialisation facilities in this sector, which will undoubtedly attract firms and jobs to the area. A reasonable assumption is that one tenth of the national growth in space science jobs by 2031 will be based in and around Harwell.

Frankly, these estimates are far too approximate ? and given that most Space activity in the Earth Sciences area is closely tied to the European space Agency ?national funding? it would seem prudent to understand the UK Government?s commitment and what real slice of the ?space industry? these emerging businesses in the Vale and Oxfordshire can capture. The Science budget is no longer ring fenced!

The Local Enterprise Partnership needs to validate the basis of these numbers both from an historical performance and in respect of the future ? bearing in mind that the majority of the funding for the existing activities at Harwell is heavily dependent on Public sector funding. There has been no detail to the growth forecasts of 1.5% over the plan period nor any explanation/evidence to support any of these numbers nor the substantial growth, ref figure 2, Ref SVUK Housing and Employment Study, which shows a Planned Economic Growth Rate in the Vale of 2% pa over the next 5 years. I believe the growth forecasts assumed make the Plan unsustainable.

Conclusion

The Objective Assessed Need of 20,560 new homes between 2011 and 2031 to meet the 23,000 new jobs is neither sustainable nor deliverable for the following reasons:

- 1 The above trend jobs growth of 10,200 new jobs in the Science Vale area alone is contributing towards an extremely ambitious economic growth rate ? above 2%. Is this deliverable together with the required four-fold increase in housing completions by 2020?

- 2 The economic growth in the Science Vale area is heavily dependent on government funding ? most from the Science budget. Does the Government forecast align with the current economic direction and the Treasury's 5 year plan?

Much of this projected growth is aligned with European partnerships ? ESA and Euratom to name just two. Are these agencies aligned to this growth in the UK's contribution?

Q5 Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Whilst I accept that this is a long term Local Plan and projections are very difficult I would submit that the economic growth is over-optimistic and the OAN of 20,560 needs more careful consideration. I would submit that a more staged approach to the OAN is needed to align with the Economic growth achieved and projected from short to medium term considerations. For example a lower OAN, based on 18,000 new jobs could be set with the opportunity to revise after 5/10 years into the plan.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Q6 If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Yes - I wish to participate at the oral examination

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Q7 If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

I believe that I can inform the public inquiry of the concerns raised above